

August 1, 2003

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

By Electronic Submission

John Muleta  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
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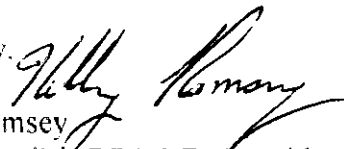
Re E911 Interim Report for Tier III Carriers  
CC Docket No. 94-102  
North Carolina RSA 1 Partnership

Dear Ms. Dortch:

Pursuant to the Commission's *Order to Stay*, in the above referenced docket,<sup>1</sup> North Carolina RSA 1 Partnership ("NCRIP") hereby submits its E911 Interim Report for Tier III carriers. This Report provides the Commission with the current status of NCRIP's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely,



Kelly Ramsey  
North Carolina RSA 1 Partnership  
(606) 878-6000

<sup>1</sup> *Commission's Order to Stay, Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order to Stay*, FCC 02-210, 17 FCC Rcd 14,841 (2002).

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## **INTERIM REPORT FOR TIER III CARRIERS**

### **NORTH CAROLINA RSA 1 PARTNERSHIP**

North Carolina RSA 1 Partnership ("NCRIP") hereby provides the Commission with its E911 Interim Report ("Report") for Tier III carriers. As a Tier III carrier, NCRIP is submitting this one-time Report in order to provide the Commission with the current status of its E911 efforts and its progress towards compliance with the Commission's Phase II benchmarks. NCRIP is the cellular licensee on the Block B frequencies in the North Carolina 1 -- Cherokee RSA (call sign KNKN890). In preparing the instant Report, NCRIP has followed the guidelines provided by the Commission in its June 30, 2003 Public Notice.<sup>1</sup>

NCRIP understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. NCRIP is using the services of Telecommunications Service Incorporated ("TSI") to assist it with its E911 implementation. TSI is a third party vendor with years of experience in assisting wireless carriers, such as NCRIP, in their E911 implementation efforts by providing both project management and implementation services. TSI has played a key role in NCRIP's E911 implementation process, coordinating the implementation process and assisting NCRIP with technical problems as they arose. TSI, with the participation of the relevant Public Switched Safety Points ("PSAPs") and Local Exchange Carriers ("LECs"), developed an implementation process by which each party was assigned implementation tasks with mutually agreed upon deadlines. To ensure that the parties were all involved and kept current, TSI hosts bi-weekly conference calls with all the parties to discuss developments and gauge progress.

#### **The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

NCRIP has received nine (9) Phase I requests from PSAPS throughout the NC-1 RSA. The nine Phase I requests were dated as follows: Haywood County Communications Center PSAP – March 28, 2002; Clay County – August 28, 2000; Cherokee County Central Communications – October 31, 2000; Macon County Emergency Management – August 21, 2000; Jackson County Comm – February 22, 2001; Graham County Communications Center – February 23, 2001; Swain County Communications Center – October 15, 2002; Cherokee Tribal 9-1-1 – December 4, 2002, and; Transylvania County Communications Center – December 1, 1999. NCRIP has received two requests for Phase II service which were dated as follows: Haywood County Communications Center PSAP – October 23, 2002, and; Graham County Communications Center – March 10, 2003.

TSI and NCRIP are working with the counties in NCRIP's service area to ensure timely and reliable E911 Phase I service. TSI and the PSAPs conduct regularly

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<sup>1</sup> See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, rel. June 30, 2003

scheduled meetings to discuss implementation milestones and the work that needs to be done to achieve these milestones. Specifically, TSI sent out surveys and information requests to the PSAPs and the LECs in order to ascertain the various elements and components of E911 Phase I that NCRIP would need to implement. This information was deemed essential for NCRIP to begin implementation efforts and to establish the requisite implementation schedule. Once NCRIP completes its E911 Phase I implementation, it will immediately address the two Phase II service requests it has received

Originally, TSI had requested that the PSAPs return their surveys to TSI by December 18, 2002. Of the nine PSAPs only four returned their surveys on a timely basis. The remaining five PSAPs returned their reports on the following dates: Transylvania County Communications Center – January 16, 2003; Clay County – January 22, 2003, Cherokee County Central Communications – April 15, 2003, Graham County Communications Center – May 7, 2003, and; Cherokee Tribal 9-1-1 – May 23, 2003. Delays by the PSAPs in returning the requested information have contributed to the delays associated with NCRIP's ability to provide E911 Phase I service because without this most basic information, such as the number of trunks from the selective router to the PSAP or the location of the ALI database, NCRIP was unable to proceed with implementation

Additionally, NCRIP has encountered some difficulty in negotiating interconnection agreements with two of the three LECs serving North Carolina 1 RSA. While NCRIP has successfully negotiated an interconnection agreement with Citizens Telephone Company (which covers Transylvania County), NCRIP is still in the process of negotiating with the remaining two LECs – BellSouth and Verizon. NCRIP notes that currently Verizon employees in North Carolina are on strike. This may further impact NCRIP's ability to order facilities and Verizon's responsiveness in general.

Upon completion of the interconnection agreements, NCRIP will be able to order the necessary ISUP trunking lines which will enable it to meet any Phase I E911 service request. NCRIP is hopeful that these agreements can be concluded in a more timely fashion as continued delays will result in implementation deadlines being pushed back.

Another hurdle that NCRIP is facing in providing E911 Phase I service in its service area is that all of the PSAPs, with the exception of Haywood County, are using stand-alone ALI databases which only have one port for incoming traffic. Thus, the PSAP cannot support multiple carriers. TSI is unable to access the database because the sole port is fully used. TSI is working internally and with the database vendors to fashion a solution.

Casting a shadow over the implementation efforts is the uncertainty generated by the recent budget cuts by the state of North Carolina. NCRIP notes that recently, the PSAPs in the state of North Carolina have lost much of their funding to the State in order to balance the budget. Haywood County alone lost approximately \$100,000 in funding.

NCR1P will work with Haywood County and the other counties to assess what, if any, effect this financial shortfall will have on the implementation process.

Recently, the NC Department of Information Technology Services (NC-DITS) began to question the reasons for NCR1P's delays in the provision of E911 Phase I service. NCR1P and TSI set up a conference call with the NC-DITS so that concerns and facts could be fully vetted. NCR1P provided an update of its implementation efforts and revised estimates of projected implementation dates. When NCR1P explained the reasons for its delays, and NCR1P's ongoing efforts, NC-DITS offered to its assistance in "getting the ear" of the appropriate personnel at both these entities. The parties concluded that the call provided a workable framework for pursuing Phase I implementation.

All nine PSAPs have been kept up to date of the status of NCR1P's efforts through TSI's bi-weekly conference calls. NCR1P believes that given the challenges faced by both NCR1P and the PSAPs, it is essential that the parties continue to provide each other with the needed flexibility to meet their E911 requests<sup>2</sup>. Once the interconnection agreements are finalized and the new lines are ordered and arrive, NCR1P will vigorously work with the LECs to ensure rapid implementation of the lines and thus work towards the provision of Phase I service. In anticipation that all continues to go well, and it is not impacted by Verizon's strike, NCR1P believes that it will be ready to go to live users by October/November 2003 for Phase I service in Haywood County and before the end of the year for the remaining counties. NCR1P and TSI have communicated to the NC-DITS that they are working as expeditiously as possible and have given Haywood County top priority. NCR1P will then begin implementation planning for Phase II once Phase I is achieved.

**The carrier's specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):**

As previously reported to the Commission, NCR1P will be utilizing a handset-based location technology solution for Phase II E911. NCR1P has begun implementing this choice by selling the requisite ALI-capable handsets throughout its service area. Indeed, approximately 50% of NCR1P's handset sales last month were for ALI-capable handsets. Thus, NCR1P has already met the September 1, 2003 benchmark to commence selling ALI-capable handsets.

The problem NCR1P is experiencing is the current cost of ALI-capable handsets. At present, ALI-capable handsets will cost NCR1P \$100 more per phone than similarly configured non-ALI capable handsets currently offered by NCR1P to its customers. Currently, in order to entice its customers to purchase the phone, NCR1P is subsidizing

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<sup>2</sup> The FCC's rules as well as a recent FCC decision make it clear that the PSAPs and the carrier may jointly agree to alternate time frames from those delineated in the FCC's rules. 47 C.F.R. § 20.18(j)(5). See also, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, *Petition of City of Richardson, Texas*, CC Docket No. 94-102, *Order on Reconsideration*, 17 FCC Rcd 24282, 24282 (2002).

the costs of the phones, an expense that, in addition to the other E911 related costs, disproportionately impacts a small carrier such as NCR1P. Quite frankly, these costs represent a real and devastating drain on NCR1P. Monies that would have been spent on providing new services, additional areas of service as well as increasing system capacity have been silently siphoned off to underwrite the purchase of ALI capable handsets

**Status on ordering and/or installing necessary network equipment.**

NCR1P shares its switch with the cellular licensee in the Asheville, North Carolina MSA. The switch is capable of handling requests for Phase II E911 service, thus there is no additional equipment that will be needed to implement Phase II E911 service. As outlined above, NCR1P is working towards completion of its interconnection agreements with the BellSouth and Verizon. Upon completion of these agreements, NCR1P will be close to successfully implementing Phase I E911 service throughout NCR1P's service area. Further, NCR1P anticipates completing this implementation by October/November for Haywood County and by the end of the year for Graham County. Once the Phase I service is available, NCR1P's cellular network will be able to carry Phase II traffic upon the completion of some minor modifications.

As for the remaining seven PSAPs, TSI and NCR1P will turn to implementation of E911 Phase II service upon completion of Phase I service. NCR1P will begin working on its Phase II E911 implementation with TSI despite there being no E911 Phase II service request from any of the remaining PSAPs covering its area.

**If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:**

As noted above, NCR1P is pursuing a handset-based solution and such handset sales comprised 50% of NCR1P's handset sales last month.

**The estimated date on which Phase II service will first be available in the carrier's network:**

NCR1P has received valid PSAP requests for Phase II service from the Haywood County Communications Center PSAP and the Graham County Communications Center. Currently, NCR1P is working diligently with both PSAPs and the LECs to provide the requested Phase I service after which the parties will turn their attention and efforts to the implementation of Phase II service.<sup>3</sup> For the remaining seven PSAPs, without a valid PSAP request for E911 Phase II service, it is difficult for NCR1P to estimate when such service will be available to those PSAPs. Should these PSAPs request such service in the near future, however, NCR1P believes that it will be capable of responding to such a request within the FCC allocated six-month period.

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<sup>3</sup> See footnote 2

**Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.**

NCR1P believes that the 95% penetration rate for ALI-capable phones by the December 31, 2005 deadline is achievable if adequate handsets can be obtained and economic issues can be overcome. However, a shortfall of ALI-capable handsets or the possible economic impact of the costs associated with obtaining the number of phones needed to meet the December 31, 2005 benchmark could stymie NCR1P's best efforts to meet the benchmark dates. NCR1P will provide the Commission with additional updates if any hurdles appear which could endanger its ability to meet the benchmark deadlines.

### DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Ramcell, Inc., the managing general partner of North Carolina RSA 1 Partnership, and I hereby certify that, to the best of my knowledge and belief, the information contained on this form and the attached document is complete and accurate.

Signed: Jill Ramsey

Date: 7-31-03